

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
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W. Simone Nicholson
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January 27, 2023

VIA ECF

The Honorable Katherine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: *A.F., et al. v. N.Y.C. Dep't of Educ.* 22-cv-9373 (JMF)(KHP)

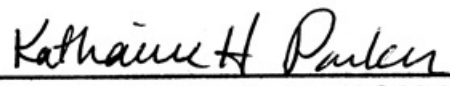
Dear Judge Parker:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq., as well as for this action.

I write on behalf of all parties to request an adjournment of the Initial Pre-Trial Conference ("IPC") scheduled for January 30, 2023 (ECF 12), sine die. I apologize for the lateness of this request and the inconvenience it has caused the Court. This case was recently reassigned to me and outgoing counsel neglected to address the pending IPC at the time of Defendant's request for an extension of time to respond to the complaint. Liability is not at issue and there is no discovery needed. With that in mind, the parties request that in lieu of the IPC, that they be permitted to submit a joint letter advising the Court on the status of the settlement negotiations in 45 days, no later than March 13, 2023.

Thank you for considering this submission.

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.
1/27/2023

Respectfully submitted,


W. Simone Nicholson
Special Assistant Corporation Counsel

cc: Adam Dayan, Counsel for Plaintiff (via ECF)